

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

STUART REGES,

Plaintiff,

v.

ANA MARI CAUCE, et al.,

Defendants.

Civil Action No.: 1:22-cv-00964-JHC

**DECLARATION OF GABRIEL
WALTERS**

Pursuant to 28 U.S.C. § 1746, I, Gabriel Walters, declare the following:

1. I am a citizen of the United States. I am over 18 years of age and fully competent to make this declaration. I knowingly and voluntarily make this declaration in support of Plaintiff's Reply in Support of Plaintiff's Motion for Summary Judgment. If called as a witness, I could and would testify competently under oath to the following facts based on my personal knowledge.

2. I am lead counsel for Plaintiff in this action. I am admitted to the bars of the State of New York and the District of Columbia. I am admitted pro hac vice in this litigation.

3. The following documents, attached as exhibits to this Declaration, are authenticated as identified below:

- a. Ex. A is a true and correct copy of excerpts from the deposition transcript of Plaintiff Stuart Reges.
- b. Ex. B is a true and correct copy of excerpts from the deposition transcript of Defendant Magdalena Balazinska.

- c. Ex. C is a true and correct copy of excerpts from the deposition transcript of University of Washington 30(b)(6) designee Eric Schnapper.
- d. Ex. D is a true and correct copy of excerpts from the deposition transcript of Defendant Nancy Allbritton.
- e. Ex. E is a true and correct copy of excerpts from the deposition transcript of University of Washington 30(b)(6) designee Chadwick Allen.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge.

Executed on January 29, 2024.

s/ Gabriel Walters
GABRIEL WALTERS

CERTIFICATE OF SERVICE

Plaintiff's counsel confirms that a true and correct copy of the foregoing was served via the Court's electronic filing system on this day, January 29, 2024. Notice of this filing will be sent by operation of the Court's electronic filing system.

DATED: January 29, 2024

Respectfully submitted,

s/Gabriel Walters
GABRIEL WALTERS*
DC Bar No. 1019272
JAMES DIAZ*
VT Bar No. 5014
FOUNDATION FOR INDIVIDUAL RIGHTS
AND EXPRESSION
510 Walnut Street, Suite 1710
Philadelphia, PA 19106
Tel: (215) 717-3473
gabe.walters@thefire.org
jay.diaz@thefire.org

CARL J. MARQUARDT
WA Bar No. 23257
LAW OFFICE OF CARL J. MARQUARDT
PLLC
1126 34th Avenue, Suite 311
Seattle, WA 98122
Tel: (206) 388-4498
carl@cjmlawoffice.com

*Admitted *Pro Hac Vice*
Attorneys for Plaintiff